

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	INDICTMENT NO.
)	1:12-CR-350
v.)	
)	
JENNIFER CHEN,)	
)	
Defendant.)	

**MOTION TO PERMIT DEFENDANT JENNIFER CHEN TO ATTEND
CAMPING TRIP WITH HER CHILDREN**

Defendant, Jennifer Chen, moves the court, with the government's consent, to permit her to attend a camping trip with her two children in North Georgia. The camping trip is being organized by several parents at the school which her children attend and is scheduled for October 14 – October 16 and will be at Indian Spring State Park.

The terms of Ms. Chen's release provide that she is required to comply with a curfew, but no particular time for the curfew was established by the court. Rather, the conditions of her release simply state that the curfew will be at the Probation Officer's discretion. The Probation Officer, David Davis, has indicated that court approval for an overnight trip is required.

As noted above, Assistant United States Attorney Doug Gilfillan, does not oppose this request.

For the foregoing reasons, the defendant requests that the Court approve the defendant's request to participate in the camping trip with her children in north Georgia between October 14 and October 16.

Respectfully submitted, this 1st day of October, 2013.

GARLAND, SAMUEL & LOEB, P.C.

/s/ Donald F. Samuel
DONALD F. SAMUEL
Ga. State Bar No. 624475

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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of October, 2013, I electronically filed the above “MOTION TO PERMIT DEFENDANT JENNIFER CHEN TO ATTEND CAMPING TRIP WITH HER CHILDREN” with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys and parties of record.

/s/ Donald F. Samuel
DONALD F. SAMUEL
Ga. State Bar No. 624475

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